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*Attorneys for Defendants*

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

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ANDREW RHODES, CASSANDRA  
MASON, and JOHN BRAY, on behalf of  
themselves and all others similarly  
situated,

Plaintiffs,

vs.

PGX HOLDINGS, INC.; PROGREXION;  
TELESERVICES, INC.; PROGREXION  
MARKETING, INC.; PROGREXION,  
ASG, INC.; EFOLKS, LLC;  
CREDITREPAIR.COM, INC.;  
CREDIT.COM, INC.; JOHN C. HEATH,  
ATTORNEY AT LAW, P.C., d/b/a  
LEXINGTON LAW FIRM,

Defendants.

**NOTICE OF BANKRUPTCY FILING BY  
PGX HOLDINGS, INC., ET AL., AND  
AUTOMATIC STAY OF  
PROCEEDINGS**

Civil No. 2:23-cv-354-JNP

Judge Jill N. Parrish

**PLEASE TAKE NOTICE** that, on June 4, 2023, PGX Holdings, Inc. and certain of its affiliates (collectively, the “Debtors”)<sup>1</sup> filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “Bankruptcy Code”), in the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”). The Debtors’ chapter 11 cases are pending before the Honorable Judge Craig T. Goldblatt, United States Bankruptcy Judge for the District of Delaware, and are being jointly administered under the lead case *In re PGX Holdings, Inc.* Case No. 23-10718 (CTG) (collectively, the “Chapter 11 Cases”).

**PLEASE TAKE FURTHER NOTICE** that pursuant to section 362(a) of the Bankruptcy Code, the Debtors’ filing of their respective voluntary petitions gives rise to a stay, applicable to all entities, of, among other things: (a) the commencement or continuation of any judicial, administrative, or other action or proceeding against the Debtors (i) that was or could have been commenced before the commencement of the Chapter 11 Cases or (ii) to recover a claim against the Debtors that arose before the commencement of the Chapter 11 Cases; (b) the enforcement, against any of the Debtors or against any property of each of the Debtors’ bankruptcy estates, of a judgment obtained prior to the commencement of the Chapter 11 Cases; and (c) any act to obtain possession of property of or from any of the Debtors’ bankruptcy estates,

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each debtor’s federal tax identification number, are: PGX Holdings, Inc. (2510); Credit Repair UK, Inc. (4798); Credit.com, Inc. (1580); Creditrepair.com Holdings, Inc. (7536); Creditrepair.com, Inc. (7680); eFolks Holdings, Inc. (5213); eFolks, LLC (5256); John C. Heath, Attorney At Law PC (8362); Progrexion ASG, Inc. (5153); Progrexion Holdings, Inc. (7123); Progrexion IP, Inc. (5179); Progrexion Marketing, Inc. (5073); and Progrexion Teleservices, Inc. (5110). The location of the Debtors’ service address for purposes of these chapter 11 cases is: 257 East 200 South, Suite 1200, Salt Lake City, Utah 84111.

or to exercise control over property of any of the Debtors' bankruptcy estates.<sup>2</sup> No order has been entered in the Chapter 11 Cases granting relief from the automatic stay.

**PLEASE TAKE FURTHER NOTICE** that additional information regarding the status of the Debtors' chapter 11 cases may be obtained by (i) reviewing, free of charge, the docket of the Debtors' chapter 11 cases on the website of the Debtors' claims and noticing agent, Kurtzman Carson Consultants LLC, at [www.kccllc.net/pgx](http://www.kccllc.net/pgx) or by calling (888) 249-2721 (toll free) or (310) 751-2694 (international), (ii) visiting the Court's website at <https://ecf.deb.uscourts.gov/> (PACER login and password required) in accordance with the procedures and fees set forth therein, or (iii) contacting any of the following proposed counsel for the Debtors: (a) Domenic E. Pacitti and Michael W. Yurkewicz, Klehr Harrison Harvey Branzburg LLP, 919 North Market Street, Suite 1000, Wilmington, Delaware 19801, Telephone: (302) 426-1189; Morton R. Branzburg, 1835 Market Street, Suite 1400, Philadelphia, Pennsylvania 19103, Telephone: (215) 569-3007 or (b) Joshua A. Sussberg, P.C., Kirkland & Ellis LLP, 601 Lexington Ave, New York, New York 10022, Telephone: (212) 446-4800; Spencer Winters, Whitney C. Fogelberg, and Alison J. Wirtz 300 North LaSalle, Chicago, Illinois 60654, Telephone: (312) 862-2000.

DATED this 20th day of June, 2023

HOLLAND & HART LLP

/s/ Bryan K. Benard

Bryan K. Benard  
Engels J. Tejeda  
Leslie M. Perkins  
*Attorneys for Defendants*

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<sup>2</sup> Nothing herein shall constitute a waiver of the Debtors' rights to assert any claims, counterclaims, defenses, rights of setoff or recoupment, or any other claims against any party to the above-captioned cases. The Debtors expressly reserve all rights to contest any claims that may be asserted against the Debtors.